

# **Mercury and Municipal Solid Waste Landfills: An Industry Perspective**

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- 12 Years of Consulting in the Municipal Solid Waste (MSW) Industry
- Vice Chairman of the Rules and Regulations Committee of SWANA
- Member of the Waste Industry Air Coalition (WIAC)
- Completed Evaluation of Mercury in Landfill Gas (LFG) for MSW Industry

# Potential Releases of Mercury From MSW Landfills

- Mercury Emissions from Working Face
- Mercury Emissions from LFG (Controlled and Uncontrolled)
- Mercury-Containing Leachate as Possible Impact to Groundwater

# Industry Review of DTSC's Draft Mercury Report

- Misleading and Conflicting Data Provided on Leaching of Mercury into Groundwater
- U.S. EPA Has Determined that Landfills are Insignificant Sources of Mercury Emissions
- Florida Landfill Mercury Study is Limited and Flawed
- Overall: Data are too Limited to Support Conclusions

# MSW Industry Conclusions

- Current Regulatory Requirements Have Reduced Mercury Disposal in Landfills
- Even Under Worst-Case Scenario for Mercury Releases, Landfills Would Contribute Only a Small Portion of Mercury Burden
- Industry Data (not all reviewed by DTSC) Support a Conclusion that Landfills are Not Significant Source of Mercury in Groundwater or Air

# MSW Industry Conclusions (cont.)

- Most Landfill Disposal Today IS Conducted at Sites with RCRA Subtitle D Lining and Leachate Collection Systems
- LFG Air Quality Regulations Significantly Reduce Mercury Emissions and Convert Organic Mercury to Elemental Form
- Overall: Evidence Does Not Support Regulatory Decisions at This Time

# MSW Industry Recommendations

- MSW Industry Supports DTSC's Efforts to Reduce Mercury Burden in the Environment
- However, Conclusions/Recommendations Must be Based on Good Science not Incomplete, Misleading, or Flawed Data
- Focus Efforts on Source Reduction Rather than End-of-Pipe Control

# MSW Industry Recommendations (cont.)

- Compile/Analyze Additional Data on Mercury in Leachate, Groundwater, and LFG; Work with Industry Trade Groups
- Concentrate on CURRENT Disposal Practices and Regulatory Requirements
- Support U.S. EPA's Efforts to Collect Data on Mercury Emissions from LFG (Ongoing CRADA project)



# Future MSW Industry Input

- MSW Industry Would Cooperate with Additional Data Compilation Efforts
- MSW Industry Would Participate in an Evaluation to Determine the Potential for Mercury Impacts to Groundwater from Unlined Landfills
- MSW Industry Would Participate in an Evaluation of the Potential for Mercury Emissions from Landfills (with and without LFG Control Systems)